

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

PLAINTIFF

v.

NO: 2:22-CV-00131-KS-MTP

TRACTOR SUPPLY COMPANY

DEFENDANT

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF
DEADLINE TO COMPLETE DISCOVERY
OR, ALTERNATIVELY, TO PERMIT DEPOSITION OUTSIDE DISCOVERY PERIOD**

COMES NOW the Defendant, and moves the court unopposed for a brief extension of the deadline to complete discovery. Defendant does not anticipate that the brief requested extension will impact any other deadlines, and does not seek an extension of the dispositive motion deadline. In support of its motion, Defendant states the following:

1. The current deadline for completing discovery in this matter is March 6, 2024, and the deadline for filing dispositive motions is March 29, 2024. The trial in this case is set for the two-week term beginning August 5, 2024, and the parties are scheduled for a settlement conference on March 18, 2024 in Hattiesburg.
2. The parties have completed all depositions with the exception of Defendant's corporate representative witness. This deposition is currently scheduled for March 6, 2024.
3. Counsel for both parties are currently engaging in settlement negotiations, which involve both monetary and significant non-monetary terms. Counsel for Defendant would prefer to spend what time remains in advance of the settlement conference in this matter to attempt to resolve this matter fully, rather than expending resources and expenses on the final deposition.

4. Counsel for the parties have conferred, and have agreed to delay the remaining deposition to after the settlement conference, but not later than March 29, 2024, assuming the Court will permit it. Accordingly, Defendant moves the Court unopposed to either extend the discovery deadline to March 29, 2024, or to permit the deposition of Defendant's corporate representative to occur on a date not later than March 29, 2024.

5. Defendant does not seek to also move the deadline for dispositive motions, currently set for March 29, 2024, and will not use the delayed deposition as grounds to later move the motions deadline. Defendant merely seeks to use the time available before the settlement conference to eliminate as many areas of controversy as possible.

6. Plaintiff does not oppose the requested extension.

7. Finally, due to the straightforward nature of this motion, the parties request that they be excused from the requirement of filing a supporting memorandum.

This, the 4th day of March, 2024.

Respectfully submitted,

/s/ Kimberly Hodges

M. Kimberly Hodges (MS Bar No. 100276)
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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I, counsel for Defendant, hereby certify that a copy of the foregoing has been served via the Court's Electronic Case Filing System upon all counsel of record on this, the 4th day of March, 2024.

/s/ M. Kimberly Hodges
M. Kimberly Hodges

CERTIFICATE OF CONSULTATION

I, the undersigned counsel for Defendant, hereby certify that I conferred with counsel for Plaintiff with regarding to the extension sought herein and was advised that Plaintiff does not oppose the requested relief.

s/ M. Kimberly Hodges
M. Kimberly Hodges